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9 Attorneys for Defendants
APEX MATERIALS, LLC, ELKHORN
10 ENVIRONMENTAL, LLC, WERDCO BC,
INC., WERDCO LLC, BRENT CONRAD,
11 BRANDON CONRAD, and PATRICIA CONRAD

12
13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 LANCE D. STUCKEY, JR., Individually and
on behalf of all others similarly situated,

16 Plaintiffs,

17 v.

18 APEX MATERIALS, LLC, ELKHORN
19 ENVIRONMENTAL, LLC, WERDCO BC,
INC., WERDCO LLC, BRENT CONRAD,
20 BRANDON CONRAD, PATRICIA CONRAD,
LAS VEGAS PAVING CORPORATION.,
21 TAB CONTRACTORS, INC., WILLIAM
CHARLES CONSTRUCTION COMPANY,
22 HARBER COMPANY, INC., John Does I to
XX, name fictitious true name and number of
23 persons being unknown, and XYZ Corporations
I to XX, name fictitious true name of number
24 of entities being unknown,

25 Defendants.

Case No. 2:22-cv-01964-APG-EJY

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME FOR
DEFENDANTS TO FILE RESPONSIVE
PLEADING TO COMPLAINT**

[SECOND REQUEST]

26 Plaintiff, LANCE D. STUCKEY, JR. ("Plaintiff"), and Defendants, APEX MATERIALS,
27 LLC, ELKHORN ENVIRONMENTAL, LLC, WERDCO BC, INC., WERDCO LLC, BRENT
28 CONRAD, BRANDON CONRAD, and PATRICIA CONRAD (collectively, the "Conrad

Defendants”), by and through their undersigned counsel, hereby agree and stipulate to extend the time for the Conrad Defendants to file a response to the Complaint [ECF No. 1] by forty-five (45) days from the current deadline of February 27, 2023, **up to and including April 13, 2023**. This is the second request for an extension of time to respond to the Complaint. The instant request for an extension is necessary because counsel for the Conrad Defendants is currently conducting an initial document collection and review, and the Conrad Defendants and Plaintiff are also exploring potential resolution of this matter. This request is made in good faith and not for the purpose of delay.

Dated: February 23, 2023

Respectfully submitted,

/s/ Leon Greenberg

LEON GREENBERG, ESQ.
RUTHANN DEVEREAUX-GONZALEZ, ESQ.
LEON GREENBERG PROFESSIONAL CORPORATION

Attorneys for Plaintiff
LANCE D. STUCKEY, JR.

Dated: February 23, 2023

Respectfully submitted,

/s/ Emil S. Kim

MONTGOMERY Y. PAEK, ESQ.
EMIL S. KIM, ESQ.
MICHAEL D. DISSINGER, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendants
APEX MATERIALS, LLC, ELKHORN ENVIRONMENTAL, LLC, WERDCO BC, INC., WERDCO LLC, BRENT CONRAD, BRANDON CONRAD, and PATRICIA CONRAD

IT IS SO ORDERED.

Dated: February 23, 2023


UNITED STATES MAGISTRATE JUDGE